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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CANDRA EVANS, individually and as
parent to R.E., TERRELL EVANS,
individually and as parent to R.E.,

Plaintiffs,
vs.

KELLY HAWES, JOSHUA HAGER,
SCOTT WALKER, JESUS JARA, CLARK
COUNTY SCHOOL DISTRICT, et al.,

Defendants.

CASE NO.: 2:22-cv-02171-JAD-DJA

**STIPULATION AND ORDER
~~[PROPOSED]~~ FOR EXTENTION
OF TIME TO COMPLETE
DISCOVERY**

THIRD REQUEST

Plaintiffs Candra Evans and Terrell Evans, individually and as parents to R.E.
(collectively "Plaintiffs"), by and through their undersigned counsel of record; and, Defendant(s),
Kelly Hawes' ("Hawes"), Joshua Hager's ("Hager"), Scott Walker's ("Walker"), Jesus Jara

1 (“Jara”) and Clark County School District’s (“CCSD”) (referred collectively herein as the “CCSD
2 Defendants”) and, together with Plaintiffs, the “Parties” by and through their undersigned counsel
3 of record, hereby stipulate to extend the time for completing discovery and request this Court
4 enter order effectuating the same of as follows:

5 At the moment, discovery in this case is governed by scheduling order entered by the
6 honorable Magistrate Judge Cameron Ferenbach on the records and by minute order dated
7 December 14, 2023. That order limits discovery to matters related to Plaintiff Candra Evan’s first
8 amendment cause of action and Plaintiff R.E.’s tort cause of action for assault and battery. The
9 order provides the parties until February 7, 2024, to complete initial said discovery.

10 **I. DISCOVERY COMPLETED**

11 The Parties have completed the following discovery:

- 12 a. Plaintiffs served and the CCSD Defendants responded to requests for admissions and
13 requests for production of documents;
- 14 b. Defendants served and the Plaintiffs responded to interrogatories, requests for
15 admissions and requests for production of documents;
- 16 c. Plaintiffs took the deposition of Defendant Hawes;
- 17 d. Plaintiffs took the deposition of Defendant Jara;
- 18 e. Plaintiffs took the FRCP 30(b)(6) deposition of Defendant Clark County School
19 District;
- 20 f. Defendants took the deposition of Plaintiff R.E.; and
- 21 g. Defendants took the deposition of Plaintiff C.E.

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II. DISCOVERY THAT REMAINS TO BE COMPLETED

The deposition of Defendant CCSD's Board President in relation to Plaintiff Candra.Evan's First Amendment Cause of Action. In addition, Plaintiffs anticipate that certain other discovery is needed relating to Plaintiff Candra Evan's First Amendment claim and R.E.'s assault and battery claim ; however, the parties have agreed to hold off on further discovery until the Court issues a decision on Defendants' pending motion to dismiss. Accordingly, the parties reserve the right to conduct additional discovery after the motion to dismiss is decided.

III. REASONS FOR EXTENSION OF TIME

The Parties reached mutually agreeable terms on the matters for examination for a 30(b)(6) witness in relation to Plaintiff Candra Evans's First Amendment claim and that deposition was conducted on January 31, 2024. Upon completion of the same, Plaintiffs determined the need to move forward with the deposition of Defendant CCSD's Board President. Due to scheduling difficulties for the witness and counsel, the deposition cannot be conducted until late February 2024 and is scheduled for February 28, 2024.

For these reasons, the Parties stipulate to extend the time to complete discovery in accordance with the schedule proposed below.

IV. PROPOSED SCHEDULE FOR COMPLETING THE DISCOVERY

The Parties will work in good faith to complete the deposition(s) identified herein by March 1, 2024.

V. CONCLUSION

The parties are doing their best to resolve outstanding discovery issues and reach agreement without the Court's involvement, and appreciate the Court's attention to this matter to avoid unnecessary disputes and respectfully stipulate to the extension requested herein.

IT IS SO STIPULATED.

DATED this 6th day of February 2024.

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/s/ Samuel Castor

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DATED this 6th day of February 2024.

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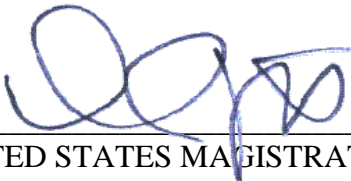
School District and Defendants Jara,

Hawes, Hager, and Walker

ORDER

Consistent with and based upon the above stipulation, **IT IS HEREBY ORDERED** that the Parties shall have until March 1, 2024, to complete depositions relating to the federal First Amendment cause of action by Plaintiff Candra Evans (Count 1).

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

2/7/2024

DATED